

ORIGINAL

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

1 to 4

45/1
1/3/02PAUL TURPIN,
Petitioner

V.

IMMIGRATION AND NATURALIZATION
SERVICE,

Respondent

Civil No. 1:CV-01-0168
(Judge Rambo)FILED
HARRISBURG, PA

JAN 02 2002

MOTION TO RECONSIDER/REOPENMARY E. DIANDREA, CLERK
Per [Signature] Deputy Clerk

AND NOW comes petitioner, Paul Turpin Pro Se and ask this Honorable Court to grant this motion to reconsider/reopen his case.

Petitioner is a layman in matters of law and has never had any training in Court procedure, as such he begs this Honorable Court's indulgence.

Petitioner was first taken into I.N.S. custody July 17, 2000. In December of 2000, petitioner filed a writ of habeas corpus in the Southern District of New York. In January 2001, this case was transferred to this Honorable Court.

In March 2001, petitioner asked and was granted counsel, Mr. Daniel Siegle from the Federal Public Defender's Office, Mr. Siegle diligently pursued the indefinite detention issue of this case with force and vigor to say the least.

In July 2001, this Court ordered the I.N.S. to remove petitioner within twenty (20) days at which time they (I.N.S.) were unable to do so, I.N.S. asked for and was given an extension of twenty (20) days and before the expiration of said twenty (20) days I.N.S. released petitioner on supervised release on August 30, 2001.

On November 28, 2001, petitioner was taken back into I.N.S. custody for what they (I.N.S.) claimed was to deport petitioner. Mr Turpin has now been in the custody of I.N.S for over thirty(30) days and ask this Honorable Court to reopen his case and reorder I.N.S. to remove or release petitioner also that counsel be reappointed to argue the merits of this case and any other actions this court finds fair and or adequate.

Respectfully Submitted

A handwritten signature in cursive script, appearing to read "Paul Turpin", with a large loop at the end.

Mr. Paul Turpin

Dated: January 3, 2002

Mr. Paul Turpin
6881-01
Berks County Prison
1287 County Welfare Rd.
Leesport, PA. 19533-9397